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May 6, 2025

**VIA ECF**

The Honorable Valerie Figueredo  
Daniel Patrick Moynahan United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: Vinci Brands, LLC v. Coach Servs. Inc., et al., Civil Action No. 1:23-cv-05138  
Vinci's Letter Motion to Seal Exhibit A to Letter Motion for Relief from Protective Order.

Dear Judge Figueredo:

Pursuant to Your Honor's Individual Rule I(g)(2), Vinci Brands LLC ("Vinci") respectfully requests Your Honor's approval to provisionally seal Exhibit A to Vinci's Letter Motion for Relief from Protective Order.

In ruling on a motion to seal, Your Honor must consider "the privacy interests of those resisting disclosure." *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 120 (2d Cir. 2006) (quoting *United States v. Amodeo*, 71 F.3d 1044, 1050 (2d Cir. 1995)). On February 7, 2024, this Court so ordered a stipulation and confidentiality agreement ("Protective Order"). Pursuant to the Protective Order, parties may mark documents produced in discovery and deposition transcripts as "Confidential" and "Highly Confidential – Attorney's Eyes Only."

On April 24, 2024, Vinci took the deposition of Case-Mate, Inc. employee, Kristen Roney. Case-Mate has designated portions of Ms. Roney's deposition transcript as Confidential. Exhibit A to Vinci's Letter Motion for Relief from Protective Order contains two pages that have been designated as Confidential. Pursuant to the protections set forth in the Protective Order, Vinci requests that Exhibit A be provisionally sealed until Case-Mate has an opportunity to move to seal. Accordingly, Vinci has filed an unredacted copy of Exhibit A under seal pending further Order from the Court.

DICKINSON WRIGHT PLLC

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Respectfully submitted,

/s/ Paul A. Del Aguila  
Paul A. Del Aguila  
Counsel for Vinci Brands LLC

cc: All Counsel of Record

**MEMO ENDORSED**



**HON. VALERIE FIGUEREDO**  
**UNITED STATES MAGISTRATE JUDGE**

Dated: 5/7/25

The motion for a provisional seal is GRANTED. If Case-Mate, Inc. seeks to permanently seal the document referenced herein, Case-Mate, Inc. is directed to make a showing under Lugosch v. Pyramid Co. of Onondaga, 435 F.3d 110 (2d Cir. 2006) by **May 17, 2025**. The Clerk of Court is directed to maintain the viewing restrictions at ECF No. 818 and terminate the motion at ECF No. 817.